

**FAX, 3 Sheets**  
**Environmental Quality Division**  
**Atlantic Division, Naval Facilities Engineering Command**

**From:** Art Wells FAX 804-322-4805  
LANTDIV VOICE 804-322-4587

**To:** Tim Gordon FAX 212-637-4437  
EPA VOICE 212-637-4167

**Date:** 31 Jul 95

Tim,

As we discussed this morning, appreciate you confirming our meeting with you and Greg Dripps of TRC Environmental on 15 Aug at 9:30 AM in NYC to discuss Roosevelt Roads RFI Project Plan issues so we can work towards properly finalizing these documents in a fashion that is acceptable to both the EPA and the Navy. Navy meeting attendees will be similar to those who attended the last meeting and will include representatives from Baker Environmental, Roosevelt Rds and LANTDIV.

Attached on the following 2 pages are the advance issues we are interested in working to resolve at this time. Please give me a call if you have any questions. Thanks for your assistance regarding this matter.

Art

cc:

Linda Saksvig, LANTDIV  
Madeline Rivera, Roosevelt Roads  
Tom Fuller, Baker Environmental  
Chris Boes, Baker Environmental  
Greg Dripps, TRC Environmental

Naval Station Roosevelt Roads  
RCRA Facility Investigation Project Plans  
Major Issues Raised in EPA Comments

1. The Navy is willing to consider analyzing a portion of the samples from SWMUs 1,2 and 3 for explosives and asbestos. We would propose SW-8330 for explosives and standard fiber count methods for asbestos.

2. **Enclosure 2 - First Comment**

The topography in the vicinity of Building 145 (SWMU 6) is extremely flat. It is the building, which is essentially a concrete tunnel, which slopes. Apparently, an excavation was made in which the building was placed. Uniform slopes exist at both ends to a low point in the middle. Only one boring was proposed at the middle of the structure since this is the low point and the place where any release would have been likely. Given this, the Navy still feels that a single boring below the invert of the building at the center point of length is adequate.

3. **Enclosure 2 - Eleventh Comment**

There are two points in this comment which require clarification.

First, the comment (also the fifteenth comment) indicates continuous sampling of borings, but does not specify analytical frequency. The Navy presently assumes that the analytical frequency will be three per hole in accordance with the repeated iteration of this criteria in TRC's comments.

Second, the work plan contains provisions for finding and rehabilitating existing wells if possible. Only if they cannot be found or repaired will new borings for wells be made. Therefore, it is quite possible (under the presently proposed scenario) that no borings will be made. Should borings for wells be required, the Navy intends to abandon any existing wells which can be located.

The same conditions are in effect for the Langley Drive Disposal Site (SWMU 2).

4. **Enclosure 2 - Fourth Comment**

The Navy is unable to locate the plot referenced for the DRMO storage yard, recollections of long-time staff are that the stain is under the new flammable storage building around which our proposed sampling is located.

Ten (10) samples in the rack area appears excessive. This area is approximately 85 feet long and 12 feet deep. A greatly reduced number of samples (e.g. 3-4) would appear reasonable.

5. **SWMU 26 - Enclosure 2 - Fifth Comment**

The SWMU location is known for certain. The Navy knows where the drums were located and to where they were pushed. These areas are encompassed by the presently proposed soil gas survey. Expanding the area of investigation appears unwarranted.

**6. TRC Comments - Page 4-7, Paragraph 4, & 4.2.1 (and others)**

The Navy questions the need for surface water sampling at SWMUs 1 and 2. The surface water in the immediate offshore is very shallow and changed frequently by tidal flux. Groundwater and sediments are being sampled. Further technical justification, other than the generic permit requirements, would be appreciated.

**7. TRC Comments - Page 4-8, Paragraph 2 & 4.2.1 (and others)**

Inspection of the shorelines at SWMUs 1 and 2 will be extremely difficult due to the inaccessibility caused by the dense jungle and mangroves. The feasible way to do it would be to clear the shore but this would cause excessive harm to sensitive environments. Accessibility at SWMU 3 is slightly better than that at SWMUs land 2. A visual examination using minimal disturbance will be performed as conditions allow.

**8. TRC Comments 4.1.5 SWMU 8**

The use of test pits at this and other appropriate SWMUs is not opposed by the Navy so long as the EPA will allow the spoil resulting from test pitting to be used to backfill the pits. Proper procedures (e.g. use of plastic sheeting, replacement of soil at as near as possible the original depth, etc.) would be followed.

**9. TRC Comments - Page 4-16, Paragraph 4 Section 4.2.6**

The Navy does not understand the requirements for full Appendix IX analyses at this SWMU since the only materials ever managed in the area are petroleum fuels. It would certainly appear that a reduced and focused analyte list is warranted.

**10. TRC Comments - 4.1.7 SWMUs 11 & 45**

The Navy believes that monitoring the groundwater in the vicinity of SWMU 11 is unwarranted. Clean-up of soils has been successfully completed as demonstrated in the recently provided project close-out report for the "Interim Remedial Action of PCB Contaminated Soils, Sites 15 and 16" (OHM Remediation Services). The Navy requests that the EPA review this report and reassess the need for groundwater monitoring at SWMU 11.

There has been additional investigatory work in the area of the USTs since the Draft RFI Work Plans were issued. This information was provided to the EPA. Based on this additional work, it is possible that the USTs may extend into the groundwater. Four borings are proposed at present. They will be advanced to a point below the invert of the USTs. If this completion depth is in the groundwater, monitoring wells will be installed. The Navy believes this approach will address the intent of the permit requirements.

**11. Other Comments**

The Navy has identified a number of other areas where the scope of investigation requires some discussion. In general, the discussions regarding these areas will not be divergent on approach, but more focused on the actual numbers of investigatory data points required.

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Public Affairs Office  
NAVFAC Atlantic  
6506 Hampton Blvd.  
Norfolk, VA 23508-1278

757-322-8005  
[NFECL\\_PAO@navy.mil](mailto:NFECL_PAO@navy.mil)